



Jones
Law Firm P.C.

Hon. Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

April 4, 2024

Via ECF Only

**Re: *Geffrard v. Nazaire* 1:24-cv-01492-MMG Motion to
Extend Deadline for Answer, Joint Case Management
Statement, and Continue Case Management Conference**

Dear Judge Garnett:

I am writing pursuant to Local Rule 7.1(d) to request an extension of the deadline to submit an Answer to the Complaint for both Defendants, a one-week extension to submit a joint case management statement, which is currently set for April 9, 2024, and a one-week extension of the case management conference, which is currently set for April 16, 2024. *See* ECF No. 7.

On March 28, 2024, counsel for Defendants informed Plaintiff's counsel that Defendants recently retained Jones Law Firm, P.C., and thereby requested that both the Individual Defendant and the Corporate Defendant file an Answer on the same date, April 12, 2024. The Individual Defendant's Answer was due on March 25, 2024, several days before retaining Jones Law Firm, P.C. for this matter.

Plaintiff's counsel was amenable to this request. There has not been any previous request for adjournments in this case.

Defendants therefore respectfully request that the Court reset the deadline to submit an Answer for both Defendants to April 12, 2024, reset the deadline to submit a joint case management statement to Tuesday, April 16, 2024 and to continue the case management conference until Tuesday, April 23, 2024, or a date to be determined by the Court.

Dated: April 4, 2024
New York, New York

Application GRANTED. Defendants' deadline to answer, move, or otherwise respond to the complaint shall be extended to **April 12, 2024**. It is further ORDERED that all parties shall appear for an Initial Pretrial Conference on **Tuesday, April 30, 2024, at 9:30 a.m.** The conference shall be held in person in Courtroom 906 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY 10007. Pursuant to the Court's Individual Rules, the parties shall file a joint letter and proposed Civil Case Management Plan no later than **April 23, 2024**. Counsel for Defendants shall file a Notice of Appearance prior to the April 30 conference. All dates and deadlines directed in the Court's Order of April 4, 2024 (Dkt. No. 14) are hereby ADJOURNED *sine die*. The Clerk of Court is respectfully directed to terminate Dkt. No. 15.

SO ORDERED. Date: 4/5/2024.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

Respectfully submitted,



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